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February 25, 1993

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FEB 26 1993

Office of the Secretary,
Donna R. Searcy,
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

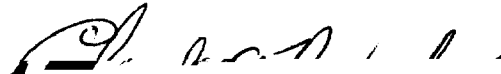
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

Transmitted herewith for filing before the Federal Communications Commission are comments on the Noticed of Proposed Rule Making PR Docket Number 92-235. These comments are being made by Suffa and Cavell, Inc., a Consulting Engineering firm regularly engaged in technical matters before the commission.

I have enclosed an original, plus nine copies, so that each Commissioner may be provided a copy of these comments.

Sincerely,



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FEB 26 1993

Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)

Replacement of Part 90 by Part)
88 to Revise the Private Land)
Mobile Radio Services and)
Modify the Policies Governing)
Them)

PR Docket No. 92-235

Response to Notice of Proposed Rule Making

1. The firm of Suffa and Cavell, Inc. ("Petitioner"),

~~regularly engaged in technical matters before the commission~~

4. In Section C. Radio Services, Sub-section 19, **Frequency Coordination**, Petitioner feels that the new emphasis on preserving spectrum and using vertical loading for non-EUO systems presents an increased burden on frequency coordinators. Loading reporting needs to be made available to these frequency coordinators in a timely fashion in order for them to perform these duties. Additionally, the statement of preference for vertical loading of small non-EUO systems should be made clearer in Part 88, as it is currently difficult to understand without the discussion in the Notice.

5. In Section D. Technical and Operational Rule Changes, Sub-section 20. **Adopt reduced ERP and HAAT Limits**, Petitioner agrees that while there are currently over-power base stations, the reduction to 300 watts ERP may not provide suitable coverage in some terrain and city conditions. A system of allowing a user to petition for higher power should be included, based on a demonstration of need. Installation of more base stations, as suggested, is not always a practical solution. The major concern is public safety radio use where 100% coverage (even within buildings) is the goal to ensure the safety of police, fire, and rescue personnel as they perform their duties.

6. In part 88.147 Petitioner feels the use of temporary licensing for itinerant operations should be allowed to continue. Many users are served by this system and the ability to use job

site, and without coordination and other delaying factors, is

needed in the VHF range. These new channels could be newly created channels that are a result of the new spectrum efficiency standards. (Please note Petitioner's earlier statement that no new channels should be created between the existing itinerant channels.) Itinerant channels should not be subject to exclusive use overlay licensing.

25 February 1992

Respectfully Submitted,

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Charles A. Rexroad, Jr.